



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

July 8, 2011

Sharon Warren, Project Manager  
U.S. Department of the Interior  
Bureau of Ocean Energy Management, Regulation and Enforcement  
Alaska OCS Region  
3801 Centerpoint Drive Suite 500  
Anchorage, Alaska 99503-5823

Re: EPA comments on the BOEMRE Chukchi Sea Planning Area, Oil and Gas Lease Sale 193 in the Chukchi Sea, Alaska, Revised Supplemental EIS (EPA# 05-049-MMS)

Dear Ms. Warren:

The U.S. Environmental Protection Agency (EPA) has reviewed the Revised Draft Supplemental Environmental Impact Statement (EIS) for the Chukchi Sea Planning Area, Oil and Gas Lease Sale 193 in the Chukchi Sea, Alaska, (CEQ No. 20110164) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures we also evaluate the document's adequacy in meeting NEPA requirements.

This EIS was prepared to augment the previous Chukchi Sea Lease Sale 193 EIS prepared in 2008, as well as the Supplemental EIS prepared in 2010 in response to the order from the Alaska District Court to evaluate impacts from natural gas, to determine missing information per 40 CFR 1502.22, and to determine if the costs of obtaining missing information would be exorbitant or unknown. This revised EIS was developed specifically in response to comments from numerous stakeholders requesting that BOEMRE conduct an analysis of a blowout scenario. BOEMRE responded in March 2011 that it would revise the Supplemental EIS to include an analysis of a Very Large Oil Spill (VLOS) scenario.

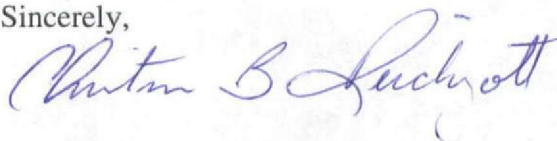
We commend the BOEMRE for being responsive to the requests to perform such an evaluation and believe the analysis will help inform the public, other stakeholders and the decision-maker of the full range of potential effects from the project. Overall, we believe the Revised Draft Supplemental EIS provides a careful and supportable analysis of a VLOS. While we have serious concerns relating to the potentially significant impacts that would occur to many Arctic resources if such an event were to occur, we recognize that the probability of such an event is very low. We also believe that the additional mitigation measures implemented as a result of the Deepwater Horizon incident, as well as the additional planning and oversight of Outer Continental Shelf activities by BOEMRE will further reduce the potential for such an event. We therefore are assigning the rating of EC-1 (Environmental Concerns-Adequate Information) to the EIS. A copy of the rating system used in conducting our review is enclosed for your reference.

We do offer a few recommendations for incorporation into the Revised Final Supplemental EIS. First, although this is a revision to a supplemental document, we believe that the addition of an Executive Summary would be helpful for readers, particularly for North Slope residents who are trying to balance everyday obligations with reviewing the numerous technical documents for Arctic projects that are constantly being developed. Second, and perhaps as part of the Executive Summary or in the discussion of alternatives in Chapter 2, we recommend that the final EIS incorporate an impact summary table. Such tables provide a useful visual aid to sharply compare the impacts associated with each alternative. Similarly, we recommend that BOEMRE consider incorporating additional figures throughout the text that will aid in visually presenting the information, where applicable. For example, in the discussion of alternatives, it would be helpful to have figures that identify the active leases as well as deferral areas for each alternative. Finally, we recommend that discussions regarding the State of Alaska Coastal Zone Management Program be revised to reflect the current status of that program.

Also, although identified briefly in the current document, with reference to a more detailed discussion in the 2008 Multi-Sale Draft EIS, we believe the responsibilities and activities of the Alaska Regional Response Team (RRT), including the development and implementation of the Arctic Sub-Area Plan, should be updated and emphasized in this document. The partnership of the RRT agencies in planning and actual response is vital to the successful response to an incident in the Arctic, especially in the VLOS scenario.

We appreciate the opportunity to review the Revised Draft Supplemental EIS. Should you have any questions regarding our comments please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov) or contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or by electronic mail at [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediments Management Unit

Enclosure